

PRISONER RIGHTS INFORMATION SYSTEM OF MARYLAND
INCORPORATED

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DAVID C. WRIGHT
(EXECUTIVE DIRECTOR)

STEPHEN Z. MEEHAN
(PRINCIPAL COUNSEL)

JOSEPH B. TETRAULT
(CHIEF STAFF COUNSEL)

FRANZELLA STARKEY
PAULINE K. WHITE

100 CHURCH ALLEY
AT LAWYERS ROW
CHESTERTOWN, MARYLAND 21620-1506

TELEPHONE 410-778-5334
FACSIMILE 410-810-0952

2001 OCT 22 P 2:58
11 EAST CHASE STREET
SUITE 3-A
BALTIMORE, MARYLAND 21202
TELEPHONE 410-625-7546
FACSIMILE 410-625-0681
CLERK'S OFFICE
AT BALTIMORE
NORMA JEAN BOONE
(OFFICE ADMINISTRATOR)
DEPUTY

B-94-264

October 18, 2001

The Honorable Walter E. Black, Jr.
Senior United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

RE: *Grandison v. Lanham, et al.*, Civil No. B-94-204; *Siler v. Simms, et al.*, Civil No. B-98-3142

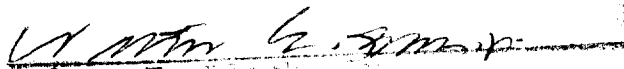
Dear Judge Black:

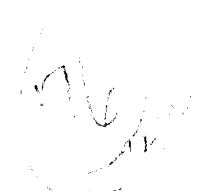
The parties have not been able to complete sufficient discovery to go to trial in the referenced cases. Therefore, please allow this letter to serve as the parties' joint request for an extension of the discovery deadline, which is now October 31, 2001. We both believe that we will be able to complete all discovery by the end of the year. Counsel therefore ask the Court to enter an Amended Scheduling Order in each of the referenced cases, providing for a discovery deadline of December 31, 2001, dispositive pretrial motions by January 31, 2002, responses by February 28, 2002, and replies thereto in accordance with the Local Rules.

Ms. Lane-Weber and I have agreed to the deposition of Plaintiff Grandison on November 13, 2001, at 10:00 a.m., at the Maryland Correctional Adjustment Center. I am enclosing a proposed order for the Court's review that allows the deposition to take place.

Both Ms. Lane-Weber and I regret the need to yet again seek an extension of the time for discovery. We apologize for any inconvenience to the Court.

APPROVED this 22nd day
of OCTOBER, 2001.

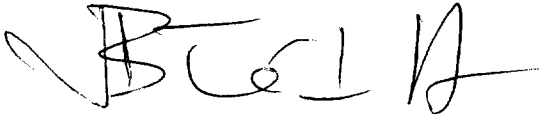

Walter E. Black, Jr.
Senior Judge



October 18, 2001
Page two

Ms. Lane-Weber has reviewed this letter and concurs in its filing. We both thank the Court for its time and consideration of these matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. B. Tetrault', with a stylized flourish at the end.

Joseph B. Tetrault
Staff Attorney
Counsel for Messrs. Grandison & Siler

cc: Stephanie Lane-Weber, Assistant Attorney General